

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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PROPOSED ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

**SUPPLEMENTAL CERTIFICATION OF CHARLES H. MULLIN, PH.D.
IN SUPPORT OF APPLICATION FOR RETENTION
OF BATES WHITE, LLC, EFFECTIVE AS OF APRIL 4, 2023**

I, Charles H. Mullin, Ph.D., of full age, hereby declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am the Managing Partner of Bates White, which maintains offices at 2001 K Street NW, North Building, Suite 500, Washington, DC 20006. Unless otherwise noted, I have personal knowledge of the facts set forth herein.

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

2. I make this declaration in support of the *Application for Retention of Bates White, LLC, Effective as of April 4, 2023* [Dkt. 421] (the “Application”).²

3. The following Bates White timekeepers are currently working on this matter. Bates White will assign additional staff to this matter at their standard hourly rates as necessary to meet demands and efficiently and effectively provide services to the Debtor.

Title	Name of Professional	Hourly rate
Partner	Mullin, Charles	\$1,375
Partner	Gallardo-Garcia, Jorge	\$1,000
Partner	Evans, Andrew	\$1,000
Partner	Lobel, Scott	\$875
Principal	Aharoni, Assaph	\$700
Managing Consultant	Peters, Sarah	\$675
Senior Data Engineer	Wieman, Christopher	\$625
Economist	Odio-Zuniga, Mariana	\$525
Economist	Malkov, Egor	\$525
Senior Consultant	Stewart, Samantha	\$520
Consultant II	Coleman, Nathan	\$465
Consultant II	Swope, Madison	\$435
Consultant II	Morey, Austin	\$435
Consultant	Villani, Joseph	\$410
Consultant	McBride, Hannah	\$410

4. None of the entities listed on Exhibit 3³ to the Certification of Charles H. Mullin, Ph.D., which certification is attached to the Application, represents more than 1% of Bates White’s revenue over the last two calendar years with the exception of Johnson & Johnson, which represents less than 2% of Bates White’s revenue over those years.

5. My understanding is that the interests of the Debtor and Johnson & Johnson are aligned in the Imerys Case in that the Debtor and Johnson & Johnson both dispute the Imerys debtors’ exposure analysis relating to talc claims that would form the basis for the indemnity

² Capitalized terms used herein but not otherwise defined have the meanings given to them in the Application.

³ Excluding the Debtor, which was inadvertently included on Exhibit 3.

claims to be asserted by the Imerys debtors against the Debtor and Johnson & Johnson in that case. In addition, my understanding is that the interests of the Debtor and Johnson & Johnson are aligned in this case regarding Bates White's role. Our role in this case is to provide expert and consulting services relating to the evaluation of the Debtor's talc liability, including in connection with a plan of reorganization. To the extent that any facts or circumstances are discovered that indicate that Bates White has a conflict of interest, any party-in-interest including the UST's right to seek at that time any appropriate relief is fully preserved. Bates White acknowledges that it has a continuing duty to apprise of any connections not previously disclosed.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: June 5, 2023
Washington, DC

/s/ Charles H. Mullin
Charles H. Mullin, Ph.D.